

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

VANESSA SANDERS, )  
Plaintiff, ) Case No. 08 CV 125  
v. ) Judge Robert M. Dow, Jr.  
ZURICH AMERICAN INSURANCE CO., ) Magistrate Judge Morton Denlow  
INC., )  
Defendant. )

**NOTICE OF MOTION**

TO: George S. Frederick  
mkpclaw@aol.com  
Mirabella, Kincaid, Frederick & Mirabella, P.C.  
1737 S. Naperville Rd., Suite 100  
Wheaton, IL 60187

**PLEASE TAKE NOTICE** that on **Thursday, March 13, 2008, at 9:15 a.m.**, or as soon thereafter as counsel may be heard, counsel for Defendant shall appear before the Honorable Judge Robert M. Dow, Jr., or any judge sitting in his stead, in Room 1919 of the Dirksen Federal Court Building, 219 South Dearborn Street, Chicago, Illinois and present the Agreed Motion For An Extension of Time For Defendant To Answer or Otherwise Plead.

Respectfully submitted,

**DEFENDANT ZURICH AMERICAN  
INSURANCE COMPANY, INC.**

By: /s/ Ami N. Wynne  
One of Its Attorneys

Nigel F. Telman  
Ami N. Wynne  
Sidley Austin LLP  
One South Dearborn Street  
Chicago, Illinois 60603  
(312) 853-7000

Dated: March 10, 2008

**CERTIFICATE OF SERVICE**

I, Ami N. Wynne, one of the attorneys for Defendant Zurich American Insurance Company Inc., certify that I caused the foregoing Notice of Motion for Agreed Motion For An Extension of Time For Defendant To Answer or Otherwise Plead to be served by upon counsel for Plaintiff by electronic filing:

George S. Frederick  
mkpclaw@aol.com  
Mirabella, Kincaid, Frederick & Mirabella, P.C.  
1737 S. Naperville Rd., Suite 100  
Wheaton, IL 60187

this 10<sup>th</sup> day of March, 2008.

/s/ Ami N. Wynne